

To: MLPA Blue Ribbon Task Force, I-Team, and SAT

From: Howard Egan

Date: 3-11-2006

Subject: Discussion of SAT Analysis of Network Proposals

During the course of SAT evaluation of our proposal, I have continuously monitored progress to ensure that the representation of Package 1 is accurate *and* honest. As a result, I occasionally found errors in the SAT or Staff analyses. Following are spacing issues that remain unresolved or have been fixed before or during the March SAT meeting and re-surfaced afterwards.

Gaps and Upwelling Issue in Both Executive Summary and Size and Spacing Analysis

From the "*How packages differ*" section:

9. Packages 2 and S meet the MPF spacing guidelines for all habitats protected at high levels, whereas packages 1 and 3 have a gap between MPAs in one habitat that exceeds MPF guidelines, and Package AC has two gaps that exceed MPF guidelines. (*the gaps in packages 1 & 3 reflect miscommunications between the SAT and package proponents, and can be rectified)*

This statement is false on several levels.

Regarding spacing, we were given very explicit guidance prior to and during our meeting with SAT and Staff on 2/6/2006 and followed it to the letter. During our meeting with Staff and SAT members (Rick Starr, Mark Carr, and Steve Gaines), we actually drew maps of MPAs at Point Sur, none of which went near the shore, and Steve Gaines, Mark Carr and Rick Starr all said that roughly similar MPAs to the one we finally arrived at would meet *both* the upwelling and 30-100 m rock spacing criteria. The primary difference in the MPAs we drew in the meeting and the one we finally arrived at was that the MPAs in the meeting were all smaller than the size guidelines, so the final MPA we created we shaped in such a way as to meet spacing and size guidelines, and comply with the habitat requirements for 30-100 meter rock and upwelling.

Subsequently during the SAT meeting on March 2, 2006, Steve Gaines claimed to have not seen the final Pt Sur MPA and would have told us MPAs that don't reach shore would not count in the upwelling spacing. However, this is not true. *He saw and agreed with the MPA concepts we drew*. Several other SAT members disagreed substantially with Steve Gaines' conclusions during the March 2 meeting. .

During the March 2 SAT meeting, two clear points were made: 1) Spacing for upwelling centers isn't really relevant (Steve Palumbi), and 2) The habitat represented in the the Pt Sur MPA has just as much or more relevance in this particular region than the shallower habitats (Palumbi, Starr, Yaklovich).

In response to this input from other SAT members, Steve Gaines specifically said that he would

make it clear that the upwelling gap was not a significant issue for two reasons 1) 30-100 meter rocky habitats can benefit from upwelling, and are included in an upwelling center, and 2) Steve Palumbi's argument that spacing for upwelling centers isn't nearly as relevant as other habitats.

Instead, the executive summary says that the upwelling criteria is not met and that it is the result of a mis-understanding. This not only wrong, but it is totally contrary to the conclusions of the SAT. This is easily verifiable by simply watching the SAT video. If one conclusion of the executive summary is contrary to the conclusions of the SAT, then what can be said of other conclusions in the executive summary?

The March 2 SAT conclusions were clear and unambiguous.

1. Conclusion 1: Spacing for upwelling centers isn't particularly relevant (Steve Palumbi), and
2. Conclusion 2: The habitat represented in the the Pt Sur MPA possibly has just as much or more relevance w/ respect to upwelling in this particular region than the shallower habitats (Palumbi, Starr, Yaklovich).

The SAT made an official decision to reflect conclusions 1 and 2, ***and credit package 1 with meeting all spacing guidelines*** as the official outcome of the upwelling spacing analysis for package 1.

The executive summary paints a very different picture in item 9, page 3.

From a sheer accuracy perspective, the following link to figures show without ambiguity that the Pt Sur MPA is squarely within the origin of an upwelling center, and just as importantly that an MPA in shallower water may not even be at an upwelling center.

<http://pages.sbcglobal.net/howa/Upwelling/upwelling.htm>

Larval transport is perhaps the number one cited benefit of upwelling. The Pt Sur MPA clearly can benefit from this just as well, or perhaps better than an inshore MPA which may or may not actually be subjected to upwelling.

Gaps and Deep Sand (>100 meters) Issue in Both Executive Summary and Size and Spacing Analysis

Again we refer to this quote from the “How packages differ” section:

9. Packages 2 and S meet the MPF spacing guidelines for all habitats protected at high levels, whereas packages 1 and 3 have a gap between MPAs in one habitat that exceeds MPF guidelines, and Package AC has two gaps that exceed MPF guidelines. (*the gaps in packages 1 & 3 reflect miscommunications between the SAT and package proponents, and can be rectified)*

As it turns out, Packages 2, 3, and S have a gap-exceeding-guidelines that Package 1 does not. This gap is for the deep sand > 100m habitat. The figure on the following page shows the gaps for the particular habitats. The gaps of 71 and 70 miles for packages 2 and S respectively both exceed guidelines. During the previous (January) round of analysis, package 3 had a similar gap for which it was awarded the 2nd of two gaps exceeding guidelines.

This combined with the obvious upwelling spacing error clearly shows that from a spacing perspective, only Package 1 meets the spacing guidelines.

